To: McCoy, Erin[McCoy.Erin@epa.gov]; Amie Davidson[amie.davidson@dnr.iowa.gov]
From: Jackson, Hylton
Sent: Thur 3/23/2017 3:04:58 PM
Subject: Re: Proposed RAOs for your review

Erin,
I think these proposed RAO are acceptable but I would raise one point. The original RAO for the SPA does not mention or impose any objective for the surface water. The threat to benthic organisms was the only scenario in the recent Environmental Risk Assessment that needed to be addressed. If the option were to be considered, could someone eliminate the threat from surface water and the risk to benthic organisms by eliminating them both (filling in the pond)?

On Wed, Mar 22, 2017 at 9:29 AM, McCoy, Erin <McCoy.Erin@epa.gov> wrote:

> Hylton, below are the revised proposed RAOs for Dico. Please let me know if the state concurs. Thanks!
>
> **Buildings**
>
> 1997 RAOs:
>
> •□□□□□□□ For the buildings, maintain the control of potential exposure pathways related to contaminated materials in Buildings 1 through 5 and the Maintenance Building, and protect human health and the environment during continued and future industrial uses.
>
> •□□□□□□□ For the soils, maintain the control of potential exposure pathways related to contaminated soils and protect human health and the environment during continued and future industrial uses similar to the current industrial operations and activities.
>
> Proposed New RAOs:
>
> •□□□□□□□ Eliminate human exposure via inhalation, incidental ingestion, and dermal absorption to contamination present within the site buildings.
>
> •□□□□□□□ Prevent human exposure to COC contaminated soil at levels that pose unacceptable risk to commercial and recreational use.
>
> **SPA**
>
> 1997 RAOs:

•□□□□□□□□ For the South Pond Sediment, minimize the risks from potential exposure pathways related to contaminated soils and protect human health and the environment during continued and future industrial uses.

Proposed New RAOs

•□□□□□□□□ Reduce cancer and non-cancer risks to human health from incidental ingestion and dermal contact with COCs in sediment in the SPA to exposure levels that are acceptable for commercial and recreational uses.

•□□□□□□□□ Reduce cancer and non-cancer risks to human health from direct contact (ingestion, inhalation, and dermal contact) with COCs in surface water to exposure levels that are acceptable for commercial and recreational uses.

•□□□□□□□□ Reduce risk to benthic organisms from ingestion of and direct contact with COCs in sediment to acceptable exposure levels.

Erin McCoy, P.G. | Remedial Project Manager

EPA Region 7 | Superfund Division | Superfund Remediation Branch

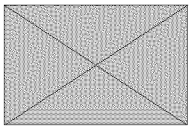
11201 Renner Blvd | Lenexa, KS 66219

Phone: 913.551.7977

mccoy.erin@epa.gov | www.epa.gov

--

Hylton Jackson| Environmental Specialist



Iowa Department of Natural Resources

P 515-725-8338 | F 515-725-8201 | 502 E. 9th St., Des Moines, IA 50319

www.iowadnr.gov